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Counsel for Defendant Google LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL CATALDO,
JULIAN SANTIAGO, and SUSAN LYNN
HARVEY, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 3:20-cv-04688-RS

**JOINT WITNESS LIST AND NEUTRAL
STATEMENT FOR THE JURY VENIRE**

Judge: Hon. Richard Seeborg
Trial Date: August 19, 2025
Courtroom: 3, 17th Floor

Pursuant to the Court's instructions at the final pretrial conference and the Clerk's request, the Parties submit their joint list of witnesses and an agreed upon neutral statement of the case to be used for the jury venire.

I. Joint Witness List

Witness Names
Black, John
Cataldo, Sal
Ganem, Steve
Ghose, Anindya
Harvey, Susan Lynn
Heft-Luthy, Sam
Hochman, Jonathan
Hoffman, Donna
Kearns, Jason Craig
Keegan, Mark
Knittel, Christopher
Langner, Belinda
Lasinski, Michael
Miraglia, Eric
Monsees, David
Pichai, Sundar ¹

¹ **Plaintiffs' position:** In accordance with the Court's ruling, Plaintiffs do not intend to call Mr. Pichai as a witness. However, Plaintiffs do intend on submitting Congressional testimony from Mr. Pichai at trial, therefore, Plaintiffs respectfully request the Court include Mr. Pichai's name on this list for the purposes of the jury venire.

Google's position: This Court ruled that Plaintiffs cannot call Mr. Pichai as a witness in this case. He therefore does not belong on the Parties' witness list. It would be prejudicial to suggest to the jury venire that Mr. Pichai belongs among the parties' witnesses, particularly given the purpose of

Rodriguez, Anibal
Ruemmler, Christopher
Santiago, Julian
Schneier, Bruce

II. Neutral Statement

This is a class action, in which three people called Plaintiffs are asserting claims against Google on behalf of groups of other people, which are called “classes.” Plaintiffs claim that Google violated the law by collecting, saving, and/or using information about their activities on mobile apps without their permission. These claims concern Google’s conduct between July 1, 2016 and September 23, 2024.

Plaintiffs assert three claims against Google. First, Plaintiffs claim that Google’s conduct violated the California Comprehensive Computer Data Access and Fraud Act, which is abbreviated “CDAFA.” Second, Plaintiffs claim that Google is liable for invasion of privacy. And third, Plaintiffs claim that Google is liable for intrusion upon seclusion.

Google denies Plaintiffs’ claims and also asserts certain affirmative defenses that, if you find to be applicable, would make Google not liable in whole or in part. These affirmative defenses include Google’s assertions that Plaintiffs consented to Google’s conduct at issue, and that some portion of each of Plaintiffs’ three claims are barred by the applicable statutes of limitations.

the list, which is to elicit personal connections potential jurors may have to the testifying witnesses. Presumably, any such connection will be revealed regardless.

1 Dated: August 12, 2025

Dated: August 12, 2025

2 **BOIES SCHILLER FLEXNER LLP**

3 **COOLEY LLP**

4 By: /s/ Mark C. Mao

By: /s/ Benedict Y. Hur

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ATTESTATION

I, Mark Mao, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: August 12, 2025

By: /s/ Mark C. Mao